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Attorneys for Lehman Brothers Holdings Inc. and  
Certain of Its Affiliates

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:
<b>In re</b>	:
	:
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	:
	:
<b>Debtors.</b>	:
	:
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**Chapter 11 Case No.  
08-13555 (JMP)  
(Jointly Administered)**

**CERTIFICATE OF NO OBJECTION UNDER  
28 U.S.C. § 1746 REGARDING OMNIBUS CLAIMS  
OBJECTIONS SCHEDULED FOR HEARING ON APRIL 25, 2013**

TO THE HONORABLE JAMES M. PECK  
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), or LBHI as Plan Administrator under the Modified Third Amended Joint Chapter 11

Plan of LBHI and its Affiliated Debtors (the “Plan Administrator”), filed the following motions and omnibus claims objections (collectively, the “Claims Objections”) with the Court for hearing on or before April 25, 2013:

- (a) Three Hundred Ninety-Fifth Omnibus Objection to Claims (Duplicative Claims) **[ECF No. 34729]**
- (b) Four Hundred First Omnibus Objection to Claims (Valued Derivative Claims) **[ECF No. 36005]**
- (c) Four Hundred Fourth Omnibus Objection to Claims (Employment-Related Claims) **[ECF No. 36008]**
- (d) Four Hundred Fifth Omnibus Objection to Claims (No Liability Claims) **[ECF No. 36009]**
- (e) Four Hundred Sixth Omnibus Objection to Claims (Insufficient Documentation Claims) **[ECF No. 36010]**
- (f) Four Hundred Seventh Omnibus Objection to Claims (Insufficient Documentation Claims) **[ECF No. 36011]**
- (g) Motion Pursuant to Section 105(a) of the Bankruptcy Code to Deem the Schedules of Liabilities Amended **[ECF No. 36026]**

2. In accordance with the Second Amended Case Management Order, the Debtors, or the Plan Administrator, as applicable, established deadlines (the “Response Deadline”) for each Claim Objection for parties to object or file responses. The Response Deadlines have been extended for certain creditors from time to time. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadlines have now passed and, to the best of my knowledge, no responsive pleadings to the Claims Objections have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on counsel to the Debtors or the Plan Administrator (or such responsive pleadings may have been withdrawn) by any of the holders of the claims included on Exhibit 1 to any of the Orders attached hereto, which include only the proofs of claim for which the Claims Objection will be granted. Responses to certain of the Claims Objections were filed on the docket, or served on the Debtors or the Plan Administrator, by holders of certain proofs of claim included on the Claims Objections. The hearing on the Claims Objections as to any proof of claim for which a response was either filed on the docket or received by the Debtors or the Plan Administrator, and which response has not been resolved, has been adjourned to a future date.

4. Accordingly, the Debtors and the Plan Administrator respectfully request that the proposed orders granting the Claims Objections annexed hereto as Exhibits A through G, which, except for the inclusion of additional language to indicate that such order is supplemental to a previously entered order for a Claim Objection or to reference the inclusion of separate exhibits attached to the proposed orders for proofs of claim for which the Claims Objection is granted, adjourned or withdrawn, are unmodified since the filing of the Claims Objections, be

entered in accordance with the procedures described in the Second Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: April 24, 2013  
New York, New York

/s/ Robert J. Lemons  
Robert J. Lemons

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Attorneys for Lehman Brothers Holdings Inc. and  
Certain of Its Affiliates

**EXHIBIT A**  
**(Proposed Order – ECF No. 34729)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	<b>: Chapter 11 Case No.</b>
	<b>:</b>
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	<b>: 08-13555 (JMP)</b>
	<b>:</b>
<b>Debtors.</b>	<b>: (Jointly Administered)</b>
-----X	

**SUPPLEMENTAL ORDER GRANTING THREE HUNDRED  
NINETY-FIFTH OMNIBUS OBJECTION TO CLAIMS (DUPLICATIVE CLAIMS)**

Upon the three hundred ninety-fifth omnibus objection to claims, dated February 15, 2013 (the “Three Hundred Ninety-Fifth Omnibus Objection to Claims”),<sup>1</sup> of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, in accordance with section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664], seeking disallowance and expungement of the duplicative claims on the grounds that such claims are duplicative of the corresponding surviving claims, either exactly or in substance, all as more fully described in the Three Hundred Ninety-Fifth Omnibus Objection to Claims; and due and proper notice of the Three Hundred Ninety-Fifth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Three Hundred Ninety-Fifth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Three Hundred Ninety-Fifth Omnibus Objection to Claims.

creditors, and all parties in interest and that the legal and factual bases set forth in the Three Hundred Ninety-Fifth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Three Hundred Ninety-Fifth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claim listed on Exhibit 1 annexed hereto under the heading “*Claims to be Disallowed and Expunged*” (collectively, the “Duplicative Claims”) is disallowed and expunged in its entirety with prejudice; and it is further

ORDERED that the claim listed on Exhibit 1 annexed hereto under the heading “*Surviving Claims*” (collectively, the “Surviving Claims”) will remain on the claims register subject to the Plan Administrator’s right to object as set forth herein; and it is further

ORDERED that this Order supersedes all previous orders regarding the disposition of the Duplicative Claims listed on Exhibit 1 annexed hereto; and it is further

ORDERED that all information included on and all documentation filed in support of any Duplicative Claims, including, but not limited to, derivative and guarantee questionnaires and supporting documentation, shall be treated as having been filed in support of the corresponding Surviving Claims; and it is further

ORDERED that nothing in this Order or the disallowance and expungement of the Duplicative Claims constitutes any admission or finding with respect to any of the Surviving Claims, and the Plan Administrator’s rights to object to the Surviving Claims on any basis are preserved; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, (i) any claim listed on Exhibit A annexed to the Three Hundred Ninety-Fifth Omnibus Objection to Claims under the heading “*Claims to be Disallowed and Expunged*” that is not listed on Exhibit 1 annexed hereto; (ii) any claim listed on Exhibit A annexed to the Three Hundred Ninety-Fifth Omnibus Objection to Claims under the heading “*Claims to be Disallowed and Expunged*” that is not listed on Exhibit 1 to the *Order Granting Three Hundred Ninety-Fifth Omnibus Objection to Claims (Duplicative Claims)* [ECF No. 36322]; and (iii) any Surviving Claim; *provided, however*, that if the Court subsequently orders that a Surviving Claim is not appropriately duplicative of the corresponding Duplicative Claim, then the claims agent shall be authorized and directed to immediately reinstate such Duplicative Claim in these chapter 11 cases (the “Reinstated Claim”), and the rights of all interested parties with respect to the Reinstated Claim shall be expressly reserved; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2013  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE



## EXHIBIT 1

## IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 395: EXHIBIT 1 - DUPLICATIVE CLAIMS

## CLAIMS TO BE DISALLOWED

## SURVIVING CLAIMS

CLAIMS TO BE DISALLOWED					SURVIVING CLAIMS					
	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
1	DEUTSCHE BANK TRUST COMPANY AMERICAS AS TRUSTEE AND GRANTOR TRUST	09/18/2009	08-13888 (JMP)	18479	Undetermined	DEUTSCHE BANK TRUST COMPANY AMERICAS, AS TRUSTEE AND GRANTOR	04/20/2012	08-13888 (JMP)	68092	Undetermined
TOTAL					\$0.00					

**EXHIBIT B**  
**(Proposed Order – ECF No. 36005)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	: <b>Chapter 11 Case No.</b>
	:
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	: <b>08-13555 (JMP)</b>
	:
<b>Debtors.</b>	: <b>(Jointly Administered)</b>
-----X	

**ORDER GRANTING THE FOUR HUNDRED FIRST  
OMNIBUS OBJECTION TO CLAIMS (VALUED DERIVATIVE CLAIMS)**

Upon the four hundred first omnibus objection to claims, dated March 15, 2013 (the “Four Hundred First Omnibus Objection to Claims”),<sup>2</sup> of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664] (the “Procedures Order”), seeking to reduce and allow the Valued Derivative Claims, as more fully described in the Four Hundred First Omnibus Objection to Claims; and due and proper notice of the Four Hundred First Omnibus Objection to Claims having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) the claimants listed on Exhibit A attached to the Four Hundred First Omnibus Objection to Claims; and (vi) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and

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<sup>2</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred First Omnibus Objection to Claims.

administrative procedures for these cases [Docket No. 9653]; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred First Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Four Hundred First Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the Four Hundred First Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that each Valued Derivative Claim listed on Exhibit 1 annexed hereto is hereby modified and allowed in the amount set forth on Exhibit 1 under the column heading “Modified Amount” and any asserted amount in excess of the modified amount is disallowed; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A to the Four Hundred First Omnibus Objection to Claims that does not appear on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2013  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

## EXHIBIT 1

OMNIBUS OBJECTION 401: EXHIBIT 1 - VALUED DERIVATIVES CLAIMS

NAME	CLAIM #	FILED DATE	DEBTOR NAME	AMOUNTS					
				ADMINIS- TRATIVE	SECURED	PRIORITY	UNSECURED	EQUITY	TOTAL
1 PHOENIX F1	22105	9/21/09	Lehman Brothers Special Financing Inc.						
			TOTAL ASSERTED AMOUNT				\$92,496.12		\$92,496.12
			CLAIM AS MODIFIED				\$92,496.12		\$92,496.12
2 PHOENIX F1	22106	9/21/09	Lehman Brothers Holdings Inc.						
			TOTAL ASSERTED AMOUNT				\$92,496.12		\$92,496.12
			CLAIM AS MODIFIED				\$92,496.12		\$92,496.12
			TOTAL ASSERTED	\$0.00	\$0.00	\$0.00	\$184,992.24	\$0.00	\$184,992.24
			TOTAL NOT SUBJECT TO OBJECTION	0.00	0.00	0.00	0.00	0.00	0.00
			TOTAL SUBJECT TO OBJECTION	0.00	0.00	0.00	184,992.24	0.00	184,992.24
			TOTAL CLAIM AS MODIFIED	\$0.00	\$0.00	\$0.00	\$184,992.24	\$0.00	\$184,992.24

**EXHIBIT C**  
**(Proposed Order – ECF No. 36008)**



**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	: <b>Chapter 11 Case No.</b>
	:
<b>LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>,</b>	: <b>08-13555 (JMP)</b>
	:
<b>Debtors.</b>	: <b>(Jointly Administered)</b>
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**ORDER GRANTING FOUR HUNDRED FOURTH  
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Upon the four hundred fourth omnibus objection to claims, dated March 15, 2013 (the “Four Hundred Fourth Omnibus Objection to Claims”),<sup>3</sup> of Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking to reduce and allow the Employment-Related Claims set forth on Exhibit 1 hereto on the basis that such claims have been partially eliminated and to disallow and expunge the Employment-Related Claims set forth on Exhibit 2 hereto on the basis that the Chapter 11 Estates have no liability for such claims, all as more fully described in the Four Hundred Fourth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Fourth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief requested in the Four Hundred Fourth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that

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<sup>3</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Fourth Omnibus Objection to Claims.

the legal and factual bases set forth in the Four Hundred Fourth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Four Hundred Fourth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that pursuant to section 502(b) of the Bankruptcy Code, each Employment-Related Claim listed on Exhibit 1 annexed hereto is reduced and allowed in the amount and priority set forth on Exhibit 1 and that any asserted amounts in excess of the reduced amount are disallowed; and it is further

ORDERED that pursuant to section 502(b) of the Bankruptcy Code, each Employment-Related Claim listed on Exhibit 2 is disallowed and expunged with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A or Exhibit B annexed to the Four Hundred Fourth Omnibus Objection to Claims that is not listed on Exhibit 1 or Exhibit 2 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2013  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

## EXHIBIT 1

OMNIBUS OBJECTION 404: EXHIBIT 1 - EMPLOYMENT-RELATED CLAIMS

NAME	CLAIM #	FILED DATE	DEBTOR NAME	AMOUNTS						
				ADMINIS- TRATIVE	SECURED	PRIORITY	UNSECURED	EQUITY	TOTAL	
1	BYASSEE, LEE	4735	6/2/09	Lehman Brothers Holdings Inc.						
				TOTAL ASSERTED AMOUNT				\$645,000.00		\$645,000.00
				CLAIM AS MODIFIED				\$67,000.00		\$67,000.00
2	CALHOUN, JOHN W. III	19255	9/18/09	Lehman Brothers Holdings Inc.						
				TOTAL ASSERTED AMOUNT				\$200,000.00		\$200,000.00
				CLAIM AS MODIFIED				\$20,000.00		\$20,000.00
3	DREXELIUS, PAUL	2534	2/3/09	Lehman Brothers Holdings Inc.						
				TOTAL ASSERTED AMOUNT				\$990,000.00		\$990,000.00
				CLAIM AS MODIFIED				\$104,000.00		\$104,000.00
				TOTAL ASSERTED	\$0.00	\$0.00	\$0.00	\$1,835,000.00	\$0.00	\$1,835,000.00
				TOTAL NOT SUBJECT TO OBJECTION	0.00	0.00	0.00	0.00	0.00	0.00
				TOTAL SUBJECT TO OBJECTION	0.00	0.00	0.00	1,835,000.00	0.00	1,835,000.00
				TOTAL CLAIM AS MODIFIED	\$0.00	\$0.00	\$0.00	\$191,000.00	\$0.00	\$191,000.00

## EXHIBIT 2

OMNIBUS OBJECTION 404: EXHIBIT 2 - EMPLOYMENT-RELATED CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
1 ARMITAGE, CHRISTOPHER	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	30673	\$560,000.00	\$560,000.00	None
2 CATO, JOHN PHILIP	08-13555 (JMP)	Lehman Brothers Holdings Inc.	6/2/2009	4739	\$120,000.00	\$120,000.00	None
3 GARCIA, MIGUEL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	8/4/2009	7332	\$120,000.00	\$120,000.00	None
4 HOPKINS, JERRY	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/8/2009	10674	\$350,000.00	\$350,000.00	None
TOTAL					\$1,150,000.00	\$1,150,000.00	

**EXHIBIT D**  
**(Proposed Order – ECF No. 36009)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re** : **Chapter 11 Case No.**  
 :  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**  
 :  
**Debtors.** : **(Jointly Administered)**  
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**ORDER GRANTING THE FOUR HUNDRED FIFTH  
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Upon the four hundred fifth omnibus objection to claims, dated March 15, 2013 (the “Four Hundred Fifth Omnibus Objection to Claims”),<sup>4</sup> of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for certain entities in the above-referenced chapter 11 cases (collectively, the “Chapter 11 Estates”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the “Procedures Order”), seeking disallowance and expungement of the No Liability Claims to the extent that they assert claims for which the applicable Chapter 11 Estates do not have any liability, all as more fully described in the Four Hundred Fifth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Fifth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Fifth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases

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<sup>4</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Fifth Omnibus Objection to Claims.



set forth in the Four Hundred Fifth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the Four Hundred Fifth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto (collectively, the “No Liability Claims”) are disallowed and expunged, with prejudice, to the extent set forth therein; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, (i) any claim listed on Exhibit A annexed to the Four Hundred Fifth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto and (ii) the portion of any No Liability Claim that is not the subject of the Four Hundred Fifth Omnibus Objection to Claims; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2013  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

## EXHIBIT 1

## OMNIBUS OBJECTION 405: EXHIBIT 1 - NO LIABILITY CLAIMS

NAME	DEBTOR NAME	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION	REASON FOR PROPOSED DISALLOWANCE
1 BMO CAPITAL MARKETS FINANCING, INC.	Lehman Brothers Holdings Inc.	24935	\$4,278.00 *	\$4,278.00 *	None	Claimant filed Claim 24935 in it capacity as an individual lender under that certain Credit Agreement dated as of March 14, 2008 (the "Credit Agreement"), among, inter alia, LBHI, the various Lenders party thereto, and JPMorgan Chase Bank, N.A. ("JPMorgan"), as Administrative Agent. JPMorgan, as Administrative Agent, filed Claim 22077 on behalf of all of the lenders under the Credit Agreement. Therefore, the claimant was not the proper party to file this claim, and this claim is duplicative of Claim 22077 filed by JPMorgan.
2 COLEMAN, MICHAEL ALEXIS SR.	Lehman Brothers Holdings Inc.	67363	Undetermined	Undetermined	None	Claim 67363 is based on brokerage transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant for such transactions.
3 COMMUNITY TRUST BANCORP INC.	Lehman Brothers Holdings Inc.	14805	\$5,000,000.00	\$5,000,000.00	None	Claim 14805 reflects that the claim is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant for such transaction or transactions.

## OMNIBUS OBJECTION 405: EXHIBIT 1 - NO LIABILITY CLAIMS

NAME	DEBTOR NAME	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION	REASON FOR PROPOSED DISALLOWANCE
4 HENRY SCHEIN, INC.	Lehman Commercial Paper Inc.	1936	\$10,000.00	\$10,000.00	None	Claim 1936 is based on an upfront fee (the "Upfront Commitment Fee") allegedly paid by claimant-borrower in respect of LCPI's projected lending commitment under that certain Credit Agreement dated as of September 5, 2008 (the "Credit Agreement"). As per the terms of the Fee Letter dated July 30, 2008, which relates to the Credit Agreement and the Commitment Letter referenced in the Fee Letter, the Upfront Commitment Fee "shall not be refundable under any circumstances, regardless of whether the transactions or borrowings contemplated by the Commitment Letter are consummated." Because the Upfront Commitment Fee was non-refundable, LCPI is not liable to return any amount of such fee to claimant-borrower.
5 MALAYAN BANKING BERHAD	Lehman Brothers Special Financing Inc.	18066	\$8,370,926.11	\$8,370,926.11	None	Claim 18066 is based on a derivatives transaction between claimant and Lehman Brothers International Europe (the "LBIE Transaction"). The LBIE Transaction incorrectly references an ISDA Master Agreement between claimant and LBSF (the "LBSF ISDA"). The Debtors' records reflect that LBSF has no contractual relationship to the LBIE Transaction, and that, in any event, the LBSF ISDA was terminated in 2003. As such, LBSF is not liable on account of the claim.
6 PITNEY BOWES GLOBAL FINANCIAL SERVICES	Lehman Brothers Holdings Inc.	11979	\$11,849.03	\$11,849.03	None	The Debtors' records reflect that Claim 11979 is based on a transaction or transactions between claimant, on the one hand, and Lehman Brothers Inc., a non-Debtor entity, and/or Neuberger Berman Group LLC, also a non-Debtor entity, on the other hand. LBHI has no liability to claimant relative to such transaction or transactions.

## OMNIBUS OBJECTION 405: EXHIBIT 1 - NO LIABILITY CLAIMS

NAME	DEBTOR NAME	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION	REASON FOR PROPOSED DISALLOWANCE
7 SBA SENIOR FINANCE, INC.	Lehman Commercial Paper Inc.	22611	\$481,958.60	\$481,958.60	None	Claim 22611 is based on fees allegedly paid by claimant-borrower related to that certain Credit Agreement dated as of January 18, 2008, among, <i>inter alia</i> , claimant, as borrower, and several lenders thereto, including LCPI (the "Credit Agreement"). The portion of Claim 22611 in the amount of \$375,000.00 relates to an upfront fee (the "Upfront Commitment Fee") allegedly paid by claimant-borrower in respect of LCPI's projected lending commitment under the Credit Agreement. As per the terms of the Fee Letter dated January 18, 2008, which relates to the Credit Agreement, the Upfront Commitment Fee was not refundable "under any circumstances." The remaining portion of Claim 22611 in the amount of \$106,958.60 relates to additional fees under the Credit Agreement (the "Additional Fees") that were purportedly paid by claimant-borrower subsequent to the filing of LCPI's chapter 11 case. However, claimant-borrower sent several notices to LCPI indicating that the Additional Fees would be held by the Administrative Agent until LCPI cured its alleged default under the Credit Agreement. The Additional Fees were never paid to LCPI and the Credit Agreement has since been terminated. Therefore, LCPI is not liable to claimant for any portion of this claim.
8 STP CO-OP TA L SOC LTD, THE	Lehman Brothers Holdings Inc.	34788	\$1,224,461.00	\$1,224,461.00	None	The securities underlying Claim 34788 were not issued by LBHI or any of its affiliates. LBHI does not owe any obligations in respect of such securities.

OMNIBUS OBJECTION 405: EXHIBIT 1 - NO LIABILITY CLAIMS

NAME	DEBTOR NAME	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION	REASON FOR PROPOSED DISALLOWANCE
9 VIRGINIA RETIREMENT SYSTEM	Lehman Commercial Paper Inc.	31814	\$930.68	\$930.68	None	Claim 31814 reflects that the claim is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant for such transaction or transactions.
TOTAL			\$15,104,403.42	\$15,104,403.42		

**EXHIBIT E**  
**(Proposed Order – ECF No. 36010)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re** : **Chapter 11 Case No.**  
 :  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**  
 :  
**Debtors.** : **(Jointly Administered)**  
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**ORDER GRANTING FOUR HUNDRED SIXTH OMNIBUS  
OBJECTION TO CLAIMS (INSUFFICIENT DOCUMENTATION CLAIMS)**

Upon the four hundred sixth omnibus objection to claims, dated December 17, 2012 (the “Four Hundred Sixth Omnibus Objection to Claims”),<sup>5</sup> of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking to disallow and expunge the Insufficient Documentation Claims, all as more fully described in the Four Hundred Sixth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Sixth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Sixth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Four Hundred Sixth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

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<sup>5</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Sixth Omnibus Objection to Claims.



ORDERED that the relief requested in the Four Hundred Sixth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A annexed to the Four Hundred Sixth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2013  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

## EXHIBIT 1

## OMNIBUS OBJECTION 406: EXHIBIT 1 - INSUFFICIENT DOCUMENTATION CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
1 COMMONWEALTH OF VIRGINIA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/18/2009	19268	Undetermined	Undetermined	None
2 COMMONWEALTH OF VIRGINIA	08-13899 (JMP)	Lehman Brothers Derivative Products Inc.	9/18/2009	19269	Undetermined	Undetermined	None
3 COMMONWEALTH OF VIRGINIA	08-13885 (JMP)	Lehman Brothers Commodity Services Inc.	9/18/2009	19270	Undetermined	Undetermined	None
4 COMMONWEALTH OF VIRGINIA	08-13902 (JMP)	Lehman Brothers Financial Products Inc.	9/18/2009	19271	Undetermined	Undetermined	None
5 COMMONWEALTH OF VIRGINIA	08-13900 (JMP)	Lehman Commercial Paper Inc.	9/18/2009	19272	Undetermined	Undetermined	None
6 TREASURER OF THE STATE OF ILLINOIS	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/17/2009	15165	\$26,170.02	\$26,170.02 *	None
TOTAL					\$26,170.02	\$26,170.02	

**EXHIBIT F**  
**(Proposed Order – ECF No. 36011)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re** : **Chapter 11 Case No.**  
 :  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**  
 :  
**Debtors.** : **(Jointly Administered)**  
-----X

**ORDER GRANTING FOUR HUNDRED SEVENTH OMNIBUS  
OBJECTION TO CLAIMS (INSUFFICIENT DOCUMENTATION CLAIMS)**

Upon the four hundred seventh omnibus objection to claims, dated March 15, 2013 (the “Four Hundred Seventh Omnibus Objection to Claims”),<sup>6</sup> of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking to disallow and expunge the Insufficient Documentation Claims, all as more fully described in the Four Hundred Seventh Omnibus Objection to Claims; and due and proper notice of the Four Hundred Seventh Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Seventh Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Four Hundred Seventh Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

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<sup>6</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Seventh Omnibus Objection to Claims.

ORDERED that the relief requested in the Four Hundred Seventh Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A annexed to the Four Hundred Seventh Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2012  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

## EXHIBIT 1

## OMNIBUS OBJECTION 407: EXHIBIT 1 - INSUFFICIENT DOCUMENTATION CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
1 ARENDT, GISELA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/2/2009	61672	\$20,000.00	\$20,000.00	None
2 DIDDENS, CHRISTA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/27/2009	48902	\$3,004.20	\$3,004.20	None
3 ELBESHAUSEN, ENNO	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/30/2009	57557	\$52,857.00	\$52,857.00	None
4 GOCKE, RUTH	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/27/2009	49536	\$7,459.07	\$7,459.07	None
5 HOERNER, KARL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/19/2009	41475	\$21,014.00	\$21,014.00	None
6 INACIO FERREIRA, JOSE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/2009	56567	\$79,387.11	\$79,387.11	None
7 KABAN, HERBERT	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/2009	55129	\$17,350.20	\$17,350.20	None
8 KUPPENS, PETIA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/2009	55128	\$7,229.25	\$7,229.25	None
9 LENSING, ANNA MARGARETE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/2/2009	61553	\$32,660.00	\$32,660.00	None
10 LENSING, ANNA MARGARETE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/2/2009	61554	\$35,500.00	\$35,500.00	None
11 MALISCH-WARAKOMS KI, JAROSLAW	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/26/2009	46669	\$1,497.72	\$1,497.72	None



## OMNIBUS OBJECTION 407: EXHIBIT 1 - INSUFFICIENT DOCUMENTATION CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
12 MULLER-LANGENBEC U, GARLEF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/2/2009	61371	\$70,000.00	\$70,000.00	None
13 ORTLOFF, ANITA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/30/2009	57084	\$12,455.05	\$12,455.05	None
14 PROPERTY VALUE ESTATE FOUNDATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/26/2009	46530	\$40,334.00	\$40,334.00	None
15 SCHRODER, MARGRET	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/27/2009	48683	\$19,525.80	\$19,525.80	None
16 SIGLER, HELGA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/28/2009	50720	\$16,867.69	\$16,867.69	None
17 STUEBER, AXEL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/16/2009	40877	\$7,102.00	\$7,102.00	None
TOTAL					\$444,243.09	\$444,243.09	

**EXHIBIT G**  
**(Proposed Order – ECF No. 36026)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re** : **Chapter 11 Case No.**  
 :  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**  
 :  
**Debtors.** : **(Jointly Administered)**  
-----X

**ORDER PURSUANT TO SECTION 105(a) OF THE BANKRUPTCY  
CODE DEEMING THE SCHEDULES OF LIABILITIES AMENDED**

Upon the motion, dated March 18, 2013 (the “Motion”),<sup>7</sup> of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, pursuant to section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”) to deem the Schedules amended, all as more fully set forth in the Motion; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the Motion is granted; and it is further

ORDERED that the Schedules shall be deemed amended to modify the “Original Scheduled Amount” for each Scheduled Claim as set forth on **Exhibit 1** hereto; and it is further

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<sup>7</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

ORDERED that the claims and noticing agent, Epiq Bankruptcy Solutions LLC, is authorized and directed to modify the official claims register as necessary to implement the relief granted in this Order; and it is further

ORDERED that to the extent the relief requested in the Motion is not granted with respect to any Scheduled Claim, the Plan Administrator's rights and defenses with respect to any of the Scheduled Claims shall be preserved, including, but not limited to, the right to object to the Scheduled Claims on any basis; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from the interpretation and/or implementation of this Order.

Dated: \_\_\_\_\_, 2013  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE